

EXHIBIT 5

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMANZAR,	*	
	*	
Plaintiff,	*	
	*	
v.	*	Civil Action No.
	*	1:19-cv-01301-WMR
	*	
LATASHA TRANSRINA KEBE et al.,	*	
	*	
Defendants.	*	

**DEFENDANT KEBE’S FIRST SUPPLEMENTAL RESPONSES TO
PLAINTIFF’S FIRST SET OF INTERROGATORIES TO DEFENDANT
LATASHA KEBE**

COMES NOW, LATASHA KEBE, the Defendant in the above-styled civil action, and, after conferring with Plaintiff’s Counsel, submits the first set of supplemental responses to Plaintiff’s First Set of Interrogatories. Ms. Kebe incorporates her initial objections and responses herein.

Supplemental Response to Interrogatory No. 1

Ms. Kebe lists the following additional individuals, who may have knowledge concerning the issues in the foregoing litigation and the subject of that knowledge:

1. **Serineh Terzyan** – Associate Attorney at The Bloom Firm.

Contact Info: 26565 Agoura Rd., Suite 200, Calabasas, CA 91302; (818) 914-7397

Subject of Knowledge: After emailing Lisa Bloom regarding the threats Ms. Kebe received, she called The Bloom Firm to follow up. Ms. Kebe spoke with Ms. Terzyan

on the phone and Ms. Terzyan informed Ms. Kebe that Lisa Bloom would not be able to take her case.

2. **Armon Wiggins** – Owner of a YouTube channel called The Armon Wiggins Show.

Contact Info: Ms. Kebe only has the following contact information for Mr. Wiggins: thearmonwigginsshow@gmail.com (email); @ArmonWiggins (Twitter Handle); @thearmonwigginsshow (Instagram Profile).

Subject of Knowledge: Mr. Wiggins constantly published videos on his YouTube channel regarding the ongoing litigation between Plaintiff and Ms. Kebe. Mr. Wiggins seems to have exclusive details about Plaintiff and about Ms. Kebe, before other bloggers and media outlets have those details. Mr. Wiggins has posted numerous videos, disparaging Ms. Kebe and defending Plaintiff.

3. **Billy** – A representative for Plaintiff.

Contact Info: (917) 243-1180

Subject of Knowledge: Billy reached out to Mr. Kebe via text messages in January of 2020, claiming to be a representative of Plaintiff. Billy was trying to get Mr. Kebe to pass a message from Plaintiff to Ms. Kebe regarding an amicable resolution to this litigation and what Plaintiff wanted Ms. Kebe to do in exchange for that resolution.

4. **Male FBI Agent** – The agent at Atlanta Field Office, whom Ms. Kebe spoke with on the phone.

Contact Info: 3000 Flowers Road S, Chamblee, GA 30341; (770) 216-3000

Subject of Knowledge: Ms. Kebe called the FBI in December of 2018 by dialing the number for the Atlanta Field Office at 770-216-3000. A receptionist picked up the phone and transferred the call to an Investigator (Ms. Kebe believes it was a male). Ms. Kebe told him that she is an entertainment news blogger, has been covering stories about Plaintiff, who is a known gang member. That Plaintiff just posted messages of her and her fellow gang members discussing the fact that they were

looking for Ms. Kebe, they knew Ms. Kebe lived in Cobb County, and other specific information about her. The investigator took down Ms. Kebe's contact information and said he would call her back. The investigator advised Ms. Kebe that if she feels like she is in immediate danger, she should move her residence.

Supplemental Response to Interrogatory No. 2

Ms. Kebe has produced all of the requested content in both, the original and supplemental evidence production, which is an overwhelming amount of content. Generally, Ms. Kebe appears in the videos alone and it is Ms. Kebe's position that none of the videos, which are relevant to this litigation, have any guest appearances. In the rare event that Ms. Kebe does have a guest, she introduces them at the beginning of the video. If, after reviewing the videos, there are relevant individuals that Plaintiff is unable to identify, Ms. Kebe will provide their identities, upon receiving a specific request from Plaintiff that identifies the video by its Bates stamp. Otherwise, Plaintiff's request is unduly burdensome.

Supplemental Response to Interrogatory No. 3

(1) Ms. Kebe's Patreon Page:
<https://www.patreon.com/TashaK>

Supplemental Response to Interrogatory No. 5

After reviewing, in detail, the procedures for production and storage of content with Mr. Kebe, the original response to Interrogatory No. 5 needs to be clarified. Mr. Kebe stated that YouTube and Instagram promote live videos over pre-

recorded ones, so most of Ms. Kebe's videos do not have raw footage because they are recorded live. Due to the fact that the live videos take up tons of storage, Ms. Kebe downloads the videos from YouTube (after she uploads them) and only preserves the downloads for seven days. Afterwards, the videos are purged from Ms. Kebe's storage; however, they are all still available on her YouTube channels. This has always been the procedure for storing content that was recorded live.

Supplemental Response to Interrogatory No. 6

(1) Ms. Kebe's Patreon Page:
<https://www.patreon.com/TashaK>

Supplemental Response to Interrogatory No. 7

Ms. Kebe is solely responsible for each publication of her Content.

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VERIFICATION OF LATASHA KEBE

PERSONALLY APPEARED before me, Latasha Kebe, the Defendant, who first being duly sworn, deposes and states that she has read Plaintiff's First Set of Interrogatories to Defendant Latasha Kebe and submitted the foregoing Supplemental Responses. To the best of her knowledge, information, and belief, her supplemental responses to Plaintiff's First Set of Interrogatories to Defendant Latasha Kebe are true and correct.

By: _____

Latasha Kebe, Defendant

Sworn to and subscribed before me
this 15th day of November, 2020.

NOTARY PUBLIC

My Commission Expires: 5/1/21



CERTIFICATION PURSUANT TO FRCP RULE 26(g)(1)(B)

Pursuant to Rule 26(g)(1)(B) of the Federal Rules of Civil Procedure, the undersigned certifies that Defendant Kebe's First Supplemental Responses to Plaintiff's First Set of Interrogatories are: (i) consistent with the Federal Rules of Civil Procedure and warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law, or for establishing new law; (ii) not interposed for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; and (iii) neither unreasonable nor unduly burdensome or expensive, considering the needs of the case, prior discovery in the case, the amount in controversy, and the importance of the issues at stake in the action.

Respectfully submitted this 15th day of November, 2020.

/s/Olga Izmaylova
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